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September 21, 2021

Honorable Alison J. Nathan via ECF
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 2102
New York, NY 10007

Re: Edward Guillen v. City of New York, et al.
19 Civ. 5655 (AJN) (OTW)

Your Honor:

I am the attorney representing defendants in the above-referenced action. I write to respectfully request an extension of approximately 30 days to submit the defendants' motion for summary judgment from September 24, 2021 to October 25, 2021. I have reached out to plaintiff's counsel but have not yet heard back; I believe based on prior conversations that plaintiff's counsel would likely not consent to this request. Defendants would also further request that the due dates for plaintiff's opposition and defendants' reply also be moved correspondingly. This is the second request for an extension of time to file defendants' motion for summary judgment; Your Honor granted a prior request. No other dates would be affected by this enlargement request.

Unfortunately, I have been unable to dedicate as much as time as necessary to this motion due to a substantial workload and deadlines on other matters. I am prioritizing this motion, but am having to balance this with other deadlines and pressing issues arising on my other matters. I respectfully request an additional 30 days as I also will have pre-trial submissions due on another matter on October 11, so want to be prepared to be able to complete both this motion and the pre-trial submissions.

Defendants would propose that the briefing schedule be revised as follows:

- Defendants' motion for summary judgment due by October 25, 2021;
- Plaintiff's response in opposition due by November 24, 2021;
- Defendants' reply due by December 8, 2021.

SO ORDERED.

Thank you for your consideration.

Respectfully submitted,

Soo-Young Shin /s/
Soo-Young Shin
Senior Counsel

cc: **BY ECF**
Samuel C. DePaola
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Attorneys for Plaintiff

